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# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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August 25, 2011

TO: Internal File *DD7*

THRU: Steve Christensen, Permit Supervisor *SLC*

FROM: James Owen, Engineer *JO*

RE: Update Surface Facility Map, Energy West Mining Company, Deer Creek Mine, C/015/0018, Task #3890

## SUMMARY:

On August 15, 2011, the Division received an application for an amendment to the Mining and Reclamation Plan (MRP) of Energy West Mining Company's Deer Creek Mine. The amendment will update the Surface Facility Map for the Deer Creek Waste Rock Site. The mine has recently installed MSHA required barriers along the access road of the Waste Rock Site where embankment slopes have caused concerns for safety.

The revised map is identified as Map CM-10778-DR (Plate 4-5). Two areas along the lower portion of the access road have been protected with boulder barriers. One area along the upper portion of the access road has been protected utilizing jersey barriers. The three areas are illustrated on the map.

This memo addresses the application's compliance with the engineering (R645-301-500) and bonding (R645-301-800) sections of the Utah Coal Mining Rules.

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**TECHNICAL MEMO**

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**MINING OPERATIONS AND FACILITIES**

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

**Analysis:**

The facilities that are being installed are as per MSHA requirements and are to address safety concerns. The Division does not consider the inclusion of these barriers an item that requires an amendment to the language or narrative within the MRP. The description within the cover letter is considered sufficient. The majority of the barriers will be constructed using natural boulder guarding. One of the barrier sections will be constructed of jersey barriers.

**Findings:**

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

**MAPS, PLANS, AND CROSS SECTIONS OF RECLAMATION OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-323, -301-512, -301-521, -301-542, -301-632, -301-731.

**Analysis:**

The revised map is identified as Map CM-10778-DR (Plate 4-5). Two areas along the lower portion of the access road have been protected with boulder barriers. One area along the upper portion of the access road has been protected utilizing jersey barriers. The three areas are illustrated on the map. The map is not properly certified. The applicant states that once the Division approves the application, they will submit a hard copy of the said map which will include the proper certification.

**Findings:**

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

## **RECLAMATION PLAN**

### **BONDING AND INSURANCE REQUIREMENTS**

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

**Analysis:**

The natural boulders that are being used as barriers will not require demolition or site removal due to the fact that they can be used as fill or surface features in reclamation activities. The jersey barriers will require removal or storage. The bonding spreadsheets within the MRP include a section for miscellaneous concrete removal. The barriers qualify to be classified as miscellaneous concrete and can be covered under that section. The removal of these barriers will not constitute a change of 5%. Therefore, bonding will not need to be re-evaluated or re-adjusted.

**Findings:**

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

### **RECOMMENDATIONS:**

The amendment is recommended for conditional approval upon receipt of a properly certified Map Cm-10778-DR.